

If you want to increase localism, add MORE local non-network stations! How do you do that with an already full band?
Create MORE frequencies for NCE and LPFM use by opening up the 76 to 88 MHz Japanese FM band frequencies to FM broadcast in the US!
After Analog TV shut-off day, there will be more than enough space in the high VHF spectrum to move the affected licensees elsewhere. This will also eliminate the Channel 6 problem that prevents so many NCE frequencies from being used. Many broadcast FM receivers already support these frequencies, either as TV audio reception or as the Japanese FM band, often with an internal "country" switch. It would be TRIVIAL for manufacturers to add the band to new radios.

A whole band of radio provides so much more opportunity to the community than a single TV channel.

It might even make sense to authorize creation of HD Radio all-Digital only stations to encourage the success of HD Radio and to allow for the simplicity of transmitting in the new spectrum. With all-digital HD Radio, Single Frequency Networks become viable! And, with Single Frequency Networks, the problem of nationwide networks clogging up the whole dial is greatly reduced, as the network can use only one frequency REGION- or NATION-WIDE, all with existing technology.

Proposed band plan:

76.1 - 77.9 Mhz: State-Wide / Region-Wide NCE HD Radio Digital-Only
Single Frequency Networks

78.1 - 79.9 MHz: New Regional Commercial HD Radio Digital-Only
Single Frequency Networks, Sold in Regional Blocks

80.1 - 81.9 MHz: Commercial FM Broadcast, HD Radio Hybrid IBOC Required

82.1 - 83.9 MHz: Commercial, LPFM Only

84.1 - 85.9 MHz: NCE Reserved, LPFM Only

86.1 - 87.9 Mhz: NCE Reserved FM Broadcast, HD Radio Hybrid IBOC
Required

Number the channels 141 - 200.

The FCC should also restrict ownership of new-band non-HDSFN

stations (80-88 MHz) to local content originators who are offering to provide at least 50% original local content and who do not already have a license in that area. In general, the FCC shouldn't grant licenses to the only applicant just because they are the only one that realized that there was an opportunity to apply for a license in that area. Frequency availability studies are so difficult and expensive that you cannot expect all interested parties to apply simultaneously. You must assume there are local content providers who would have applied had they known of the possibility. We're here, but you gave our spectrum to the translators.

There are things the FCC could do to increase localism on the existing band. For instance, the FCC could allow local content providers to petition to deny renewals of network stations that have no local content. If the FCC does this, though, clear guidelines for local and public interest content should be provided. Such a guideline might include a minimum of 20% public affairs / community interest content on stations, similar to what is required of TV stations. It might also include a requirement that 20% of the content on an FM radio station be locally generated, say, perhaps, within the covered region.

It is unreasonable to require NCE stations to have personnel in the studio 12 or 24 hours a day. It is much more reasonable to require that a station have clear office / telephone hours posted on the internet and on the outside door during which the station personnel are available to meet with the community. This would allow the community to reach the station management easily.

Requiring complex reporting of station's local content is not the way to ensure local issues programs are aired. It only serves to place an undue burden on small broadcasters, like LPFMs and student-run NCEs. A simple list of regularly-scheduled programming and a simple per-week calculation of how much of that programming is locally originated and locally produced should suffice for the requirements. Any additional requirements serve simply to trouble licensees unduly.

Additionally, providing the FCC lists of music programming would

entail collection of large amounts of data that the FCC could not possibly sort through and make use of. Instead of asking for lists of music played on air, the FCC should simply require that stations play a certain amount of local musician and independent artist programming, and should ask for a certification that this is occurring. Misbehaving stations should then be asked to record further information at the request of the FCC. This solves the localism problem.

The real problem with music programming on radio in the US is payola. Instead of tossing proposed music playlist regulations and reporting requirements in with localism, the FCC should conduct separate investigations into ways to end payola and major-label preferential treatment on radio.

Thank you for reading my comments. I look forward to a direct and detailed dialog between FCC rulemakers and NCE licensees in the future. CBI and IBS stand ready to meet with FCC regulators about the needs of community and college NCE stations. Please enter a dialogue with these bodies before making any rulings that might damage any remaining localism we have in the FM reserved band.